REMOVAL PROGRAM PRELIMINARY ASSESSMENT/ SITE INVESTIGATION REPORT FOR THE JARD COMPANY INC. SITE BENNINGTON, BENNINGTON COUNTY, VERMONT 13 AND 14 JUNE 2006

Prepared For:

U.S. Environmental Protection Agency Region I Emergency Planning and Response Branch 1 Congress Street, Suite 1100 Boston, MA 02114-2023

CONTRACT NO. EP-W-05-042

TDD NO. 01-06-05-0003

TASK NO. 0183

DC NO. R-4362

Submitted By:

Weston Solutions, Inc.
Region I
Superfund Technical Assessment and Response Team III (START)
3 Riverside Drive
Andover, MA 01810

August 2006

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I. Preliminary Assessment/Site Investigation Forms

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EPA REGION I REMOVAL PRELIMINARY ASSESSMENT

| | | Site Name and | d Location | |
|---|--|--|--------------------------|-----------------------------------|
| Name: Jard Company Inc. Town: Bennington | | Location: 12 County: Ber | 26 Bowen Roa nnington | d State: Vermont (VT) |
| Site Status: | ()NPL ()ACTIVE | ()NON-NPL (X)ABANDONED | ()RCRA ()OTHER | ()TSCA |
| (X)Attached | USGS Map of | f Location | (X)Site I.D. | No.: 01L2 |
| | | Refer | ral | |
| ()Citizen ()RCRA | ()Cit ()Otl | y/Town (X)St ner: | tate ()Pr | reremedial |
| Conse Telephone: (| ervation (VT D (802) 241-3967 | DEC) | _ | nent of Environmental |
| 1) Mike Ross | si, Stone Enviro | Contacts Identification Contacts Identific | | phone: (802) 839-0544 |
| | | Source of Inf | formation | |
| () Verbal: (X) Report: (December 20 () Other: | | on Feasibility Investiga | ation Report, pr | repared by Stone Environmental, 5 |
| | | Potential Respon | nsible Parties | |
| | , | ngton Realty, LLC Road, Durham, CT 064 | - | (860) 349-1940 |
| | | Site Ac | cess | |
| Date: 1 Ma | Person: Jan Exary 2006 (860) 349-1940 | $(\mathbf{X})\mathbf{O}$ | btained t Obtained | ()Verbal (X)Written |

Historical Preservation

() Site is Historically Significant or Eligible for Historic Preservation

Contacts Identified

1) State Historical Preservation Officer (SHPO)

Name: Telephone:()

2) Tribal Historical Preservation Officer (THPO)

Name: Telephone:()

Comments:

Physical Site Characterization

Background Information: The Jard Company Inc. (Jard) site (the site) is located on 126 Bowen Road in Bennington, Vermont. The site was a former capacitor and transformer manufacturing facility that has been unoccupied since Jard declared bankruptcy in 1989. The site encompasses approximately 14 acres and includes a vacant 120,000-square-foot building; paved parking areas; grass and lightly wooded areas surrounded by a compromised chain-link fence; and a larger undeveloped wooded area outside of the chain-link fence, extending south to the Roaring Branch of the Walloomsac River (Roaring Branch) and west to adjacent properties. The site is zoned as Industrial property.

Prior to 1969, the property consisted of undeveloped woodlands. The site operated from 1969 to 1986, producing capacitors, non-fluid transformers, and motors used in household appliances. A variety of hazardous wastes were generated at the site in association with its manufacturing processes, including polychlorinated biphenyls (PCBs); a variety of volatile organic compounds (VOCs), including trichloroethylene (TCE), 1,1,1-trichloroethane (1,1,1-TCA), and toluene; semivolatile organic compounds (SVOCs), including bis-2-ethylhexyl phthalate (DEHP); waste hydraulic and lubricating oils; waste paints and varnishes; waste zinc oxide; waste-contaminated rejected capacitors; spent SpeediDri_{TM}; and PCB- and phthalate-contaminated wastewater.

During a routine industrial waste survey performed by the State of Vermont in October 1979, inspectors noted an area of dark, oil-stained soil located beneath a vent pipe on the south wall of the building. Analysis of soil collected from the approximate 100-square-foot area indicated the presence of PCBs in the form of Aroclor-1016. A similar inspection in 1987 identified a dust collector that had zinc oxide adjacent to it and a dry well that reportedly had received PCB-contaminated wastewater. In September 1989, VT DEC conducted a final Resource Conservation and Recovery Act (RCRA) inspection at approximately the same time that Jard announced that it was in bankruptcy proceedings. During this inspection, additional hazardous waste concerns were identified, including a number of drums and process-related equipment.

Physical Site Characterization (Continued)

Following these initial events, a number of investigations and removal actions were conducted by various State and Federal agency contractors in an attempt to characterize site conditions and abate imminent threats to human health and the environment, including drum/container removal, soil removal, and fence installation. Previous sample results indicated the presence of PCBs up to 1,400 milligrams per kilogram (mg/kg) in on-site concrete slabs, up to 32,000 mg/kg in sub-slab soils, and up to 74 mg/kg in surface soils. Previous sample results also indicated the presence of zinc up to 205 mg/kg in dust and 100% in duct work within the zinc hopper; trichlorofluoromethane up to 35,000 micrograms per cubic meter (μ g/m³) during sub-slab soil gas surveys; TCE, 1,1,1-TCA, 1,1-dichloroethane (1,1-DCA), toluene, xylenes, and dichlorobenzene up to 1.5 mg/kg in sub-slab soils; and DEHP up to 22,000 mg/kg in trench sludge samples.

On 19 May 2006, EPA, START, and a VT DEC representative conducted a site reconnaissance to determine the sample activities for the June 2006 event. It was determined based on VT DEC sample results from August 2005 that approximately 1/3 of the sample locations would be recreated and collected as confirmatory samples and analyzed on site by VT DEC subcontractor, Stone Environmental, Inc.

Description of Substances Possibly Present, Known or Alleged:

In 1997, a fire occurred at the site which significantly damaged a portion of the building and potentially affected the nature and distribution of contaminants at the site. The site has been owned, operated, and officially or unofficially controlled by various parties since Jard entered into bankruptcy in September 1989.

In February 2005, the Town of Bennington, planning to take title of the Jard property by tax sale, was awarded EPA funding to conduct a Targeted Brownfields Assessment (TBA) at the site as administrated through a grant to the VT DEC, Brownfields Program. Stone Environmental, Inc. (Stone) was awarded a contract by VT DEC to conduct the TBA.

During August 2005, Stone conducted the TBA and investigated the surficial features of the site, with a goal of expediting site re-use.

The TBA revealed widespread PCB contamination of interior building materials; a soil gas plume (trichlorofluoromethane) beneath the concrete slab; SVOC, VOC, and PCB contamination in the sub-slab soils; PCB contamination in exterior surface soil and deep [2.5 to 5.0 feet below ground surface (bgs)] vadose zone soils; PCB contamination in shallow overburden groundwater; and migration of a co-mingled groundwater plume from where it was observed in previous investigations. In addition, the TBA confirmed impact to the Town of Bennington municipal sanitary sewer system by site-related PCBs. There was also PCB contamination detected in interior wall surface (wipe) samples at 3,400 micrograms (µg) per 100 square centimeters.

Existing Analytical Data

() Real-Time Monitoring Data:

(X) Sampling Data:

Analytical data were generated during EPA's Emergency Planning and Response Branch (EPRB) Removal Program Preliminary Assessment/Site Investigation (PA/SI) conducted at the site on 19 March 1991, and during the subsequent removal action conducted by EPA and its contractors between 6 January and 11 November 1992.

Soil, sediment, and concrete samples collected during PA/SI activities conducted at the site by START on 17 September 1997 and 29 October 1997 were analyzed for PCBs.

Multimedia sampling results are discussed in detail in the report entitled, *Corrective Action Feasibility Investigation Report*, prepared by Stone Environmental, 5 December 2005.

Potential Threat

Description of potential hazards to environment and/or population-identify any of the criteria for a Removal Action (from NCP) that may be met by the site under 40 CFR 300.415 [b] [2].

- i. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.
- ii. Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- iii. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
- iv. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.
- v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- vi. Threat of fire or explosion.
- vii. The availability of other appropriate federal or state response mechanisms to respond to the release.
- viii. Other situations or factors that may pose threats to public health or welfare or the environment.

| | Prior Response Activities | | | | | | | | | | |
|--|---|-----------------------------------|---|---|--|--|--|--|--|--|--|
| () PRP | (X) STATE | (X) FEDE | RAL | () OTHER | | | | | | | |
| Brief Descrip | ption: | | | | | | | | | | |
| PA/SI indicate mobilized to a On 17 Septem | conducted a Removal Proted that conditions at the sthe site and conducted a rember 1997 and 29 October st 2005, Stone Environment | site warranted a moval action bet | removal action. ween 6 January a onducted PA/SI a | EPA and its contractors and 11 November 1992. | | | | | | | |
| | Priori | ty for Site Inves | tigation | | | | | | | | |
| (X) High Comments: | () Medium | () Low | () No | one | | | | | | | |
| | ŀ | Report Generati | on | | | | | | | | |
| Originator: Affiliation: | Alysha Thompson Weston Solutions, Inc. (S | START) | Date: Telephone: | 19 June 2006 (978) 552-2115 | | | | | | | |

TDD No.:

01-06-05-0003

Task No.:

0183-00



EPA REGION I REMOVAL SITE INVESTIGATION

Inspection Information

Site Name: Jard Company Inc. **Address:** 126 Bowen Road

Weather Conditions: Sunny; temperature around 75 degrees Fahrenheit (°F). **Site Status at Time of Inspection:** () **ACTIVE** (X) **INACTIVE**

Comments:

Agencies/Personnel Performing Inspection

| | <u>Names</u> | <u>Program</u> |
|---------------------|---|--|
| (X) EPA: | Allen Jarrell | U.S. Environmental Protection Agency (EPA), Region I, Emergency Planning and Response Branch (EPRB), On-Scene Coordinator (OSC). |
| (X) EPA Contractor: | Alysha Thompson Bonnie Mace Eric Ackerman Shalu Shelat | Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment and Response Team III (START). |
| (X) State: | Patricia Coppolino | Vermont Department of Environmental Conservation (VT DEC) |
| (X) Other: | Mike Rossi | Stone Environmental, VT DEC On-Site Laboratory Contractor |

Current Owner Based on Field Interview:

Jan Exman, Bennington Realty, LLC

| | Physical Sit | e Characteristics | | |
|--|--------------|---|---------------|-------------|
| Parameter | | Quantities/Extent | | |
| () Cylinders: | | | | |
| () Drums: | | | | |
| () Lagoons: | | | | |
| () Tanks: () Above: () Below: | | | | |
| () Asbestos: | | | | |
| () Piles: | | | | |
| () Stained Soil: | | | | |
| () Sheens: | | | | |
| () Stressed Vegetation: | | | | |
| () Landfill: | | | | |
| (X) Population in Vicinity | y: | A baseball field is and residences ar 1/2 mile from the s | e located app | |
| () Wells: () Drinking () Monitor | , | | | |
| () Other: | Ü | | | |
| | Physical Si | te Observations | | |
| During site activities, STA Production Area was collap | | | | roof of the |
| | Field Sampl | ling and Analysis | | |
| Matrix/Analytical | | strumentation | | |
| <u>Parameter</u> | | RAD PID | FID | Other |
| Background Readings: | 0.0/20.9% | 0.0 units | 0.0 units | |
| | | | | |
| Air: | | | | |
| Soil: | 0.0/20.9% | 0.0 units | 0.0 units | |
| Surface: | | | | |
| Water: | | | | |
| Tanks: | | | | |
| Drums: | | | | |
| Vats: | | | | |
| Lagoons: | | | | |

| Field Sampling and Analysis (Concluded) | | | | | | | | |
|---|-----------------------------|--------------|------------|-----|-------|--|--|--|
| Matrix/Analytical | Fie | ld Instrumen | tation | | | | | |
| <u>Parameter</u> | $\overline{\text{CGI/O}_2}$ | RAD | PID | FID | Other | | | |
| Spillage: | | | | | | | | |
| Run Off: | | | | | | | | |
| Piles: | | | | | | | | |
| Sediments: | | | | | | | | |
| Groundwater: | | | | | | | | |
| Other: | | | | | | | | |
| | Field Qua | lity Control | Procedures | | | | | |

(X) SOP Followed

() Deviation From SOP

Comments: START personnel conducted sampling activities in accordance with the site Sampling and Analysis Plan, entitled *Sampling and Analysis Plan for the Jard Company Inc. Site, Bennington, Vermont,* dated May 2006.

Description of Sampling Conducted

On 13 June 2006, OSC Allen Jarrell and START members Alysha Thompson, Bonnie Mace, Eric Ackerman, and Shalu Shelat arrived at the site to conduct Removal Program Preliminary Assessment/Site Investigation (PA/SI) activities. All personnel reviewed and signed the site Health and Safety Plan (HASP), which had been prepared as a separate document, entitled *Weston Solutions, Inc., Region 1 START Health and Safety Plan for the Jard Company Inc Site, Bennington, Bennington County, Vermont*, dated May 2006. START personnel established a support zone and calibrated air monitoring instruments, including a photoionization detector/flame ionization detector (PID/FID) combination unit and a combustible gas indicator/oxygen meter (CGI/O₂). Ambient conditions were recorded in the site HASP as follows: PID = 0.0 units; FID = 0.0 units; lower explosive limit (LEL) = 0%; and oxygen (O₂) = 20.9%. During site activities, START personnel photodocumented site conditions.

START members Thompson and Ackerman conducted a reconnaissance of the interior of the buildings to establish the concrete floor sample locations and the wipe sample locations using the map created by VT DEC contractor, Stone Environmental, Inc. START members Mace and Shelat conducted a reconnaissance of the exterior of the building to establish the surface soil and subsurface soil sample locations using the Global Positioning System (GPS) Waypoint Navigation feature and using the GPS locations documented by Stone Environmental, Inc. during the August 2005 sampling event.

At the conclusion of the interior and exterior reconnaissance, 16 concrete floor sample locations, five wipe sample locations, 26 surface soil sample locations, and five subsurface soil sample locations were established for on-site polychlorinated biphenyl (PCB) analysis, which was conducted by Stone Environmental, Inc.

Description of Sampling Conducted (Concluded)

START members Thompson and Ackerman collected the five wipe samples adjacent to the locations collected by Stone Environmental, Inc. in August 2005 and delivered the samples to the on-site mobile laboratory (see Appendix A - Figure 3). At the conclusion of the wipe sampling event, START member Ackerman began the collection of the concrete floor samples using a rotary hammer to drill cores in the concrete floor (see Appendix A - Figures 3 and 3A). Of the 16 concrete floor samples, START member Ackerman collected 13 due to the battery in the rotary hammer being discharged. The remaining three concrete samples were collected on 14 June 2006. Twenty-six surface soil and five subsurface soil samples were collected by START on 13 June 2006 and delivered to the on-site mobile laboratory.

Of the samples collected and analyzed on site, 10 percent of the samples were sent for confirmatory analysis at the U.S. EPA Office of Environmental Measurement and Evaluation (OEME) Laboratory, located in North Chelmsford, MA. All samples were delivered to OEME at the conclusion of site activities.

| | Analyses | |
|---|---|---|
| Analytical Parameter () VOC (X) PCB () PESTICIDE () METALS () CYANIDE () SVOC () TOXICITY () DIOXIN () ASBESTOS () OTHER Analytical re | Media () AIR () WATER (X) SOIL (X) SOURCE () SEDIMENT | Laboratory (X) NERL () CLP () PRIVATE () SAS () SOW (X) FIELD |
| Anarytical fe | esuns: see Appendix D – Anaryticai L | 7 ata |
| | Receptors | |
| () Drinking () Private: Water () Municipal: () Groundwater: () Unrestricted Access: (X) Population in Proximity: | and there are reside | |
| () Sensitive Ecosystem: () Other: | approximately 1/2 i | mie from the site. |

Additional Procedures for Site Determination

() Biological Evaluation

() ATSDR

To be determined by the Task Monitor.

Site Determination

Depending on further information, criteria that may be met by the site include 40 CFR 300.415 [b] [2], parts:

- i. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.
- ii. Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- iii. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
- iv. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.
- v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- vi. Threat of fire or explosion.
- vii. The availability of other appropriate federal or state response mechanisms to respond to the release.
- viii. Other situations or factors that may pose threats to public health or welfare or the environment.

Report Generation

Originator:Alysha ThompsonDate:19 June 2006Affiliation:Weston Solutions, Inc. (START)Telephone:(978) 552-2115

II. Narrative Chronology

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Narrative Chronology

Site History

The Jard Company Inc. (Jard) site (the site) is located on 126 Bowen Road in Bennington, Bennington County, Vermont (VT). [See Appendix A – Figures (Figure 1 – Site Location Map).] The site was a former capacitor and transformer manufacturing facility that has been unoccupied since Jard declared bankruptcy in 1989.

The site encompasses approximately 14 acres and includes a vacant 120,000-square-foot building; paved parking areas; grass and lightly wooded areas surrounded by a compromised chain-link fence; and a larger undeveloped wooded area outside of the chain-link fence, extending south to the Roaring Branch of the Walloomsac River (Roaring Branch) and west to adjacent properties. [See Appendix A – Figures (Figure 2 – Site Diagram).] The site is zoned as Industrial property.

Prior to 1969, the property consisted of undeveloped woodlands. The site operated from 1969 to 1986, producing capacitors, non-fluid transformers, and motors used in household appliances. A variety of hazardous wastes were generated at the site in association with its manufacturing processes, including polychlorinated biphenyls (PCBs); a variety of volatile organic compounds (VOCs), including trichloroethylene (TCE), 1,1,1-trichloroethane (1,1,1-TCA), and toluene; semivolatile organic compounds (SVOCs), including bis-2-ethylhexyl phthalate (DEHP); waste hydraulic and lubricating oils; waste paints and varnishes; waste zinc oxide; waste-contaminated rejected capacitors; spent SpeediDri_{TM}; and PCB- and phthalate-contaminated wastewater.

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In 1997, a fire occurred at the site which significantly damaged a portion of the building and potentially affected the nature and distribution of contaminants at the site. The site has been owned, operated, and officially or unofficially controlled by various parties since Jard entered into bankruptcy in September 1989.

In February 2005, the Town of Bennington, planning to take title of the Jard property by tax sale, was awarded EPA funding to conduct a Targeted Brownfields Assessment (TBA) at the site as administrated through a grant to the Vermont Department of Environmental Conservation (VT DEC) Brownfields Program. Stone Environmental, Inc. (Stone) was awarded a contract by VT DEC to conduct the TBA.

During August 2005, Stone conducted the TBA and investigated the surficial features of the Site, with a goal of expediting site re-use.

The TBA revealed widespread PCB contamination of interior building materials; a soil gas plume (trichlorofluoromethane) beneath the concrete slab; SVOC, VOC, and PCB contamination in the sub-slab soils; PCB contamination in exterior surface soil and deep [2.5 to 5.0 feet below ground surface (bgs)] vadose zone soils; PCB contamination in shallow overburden groundwater; and migration of a co-mingled groundwater plume from where it had been observed during previous investigations. In addition, the TBA confirmed impact to the Town of Bennington municipal sanitary sewer system by site-related PCBs. There was also PCB contamination detected in interior wall surface (wipe) samples at 3,400 micrograms (μ g) per 100 square centimeters.

On 19 May 2006, EPA, START, and a VT DEC representative conducted a site reconnaissance to determine the sample activities for the June 2006 event. It was determined based on VT DEC sample results from August 2005 that approximately 1/3 of the sample locations would be recreated and collected as confirmatory samples and analyzed on site by VT DEC subcontractor, Stone.

Sampling Activities

On 13 June 2006, OSC Allen Jarrell and START members Alysha Thompson, Bonnie Mace, Eric Ackerman, and Shalu Shelat arrived at the site to conduct Removal Program Preliminary Assessment/Site Investigation (PA/SI) activities. All personnel reviewed and signed the site Health and Safety Plan (HASP), which had been prepared as a separate document, entitled *Weston Solutions, Inc., Region 1 START Health and Safety Plan for the Jard Company Inc Site, Bennington, Bennington County, Vermont*, dated May 2006. START personnel established a support zone and calibrated air monitoring instruments, including a photoionization detector/flame ionization detector (PID/FID) combination unit and a combustible gas indicator/oxygen meter (CGI/O₂). Ambient conditions were recorded in the site HASP as follows: PID = 0.0 units; FID = 0.0 units; lower explosive limit (LEL) = 0%; and oxygen (O₂) = 20.9%. During site activities, START personnel photodocumented site conditions (see Appendix B – Photodocumentation Log).

START members Thompson and Ackerman conducted a reconnaissance of the interior of the buildings to establish the concrete floor sample locations and the wipe sample locations using the

map created by VT DEC contractor, Stone. [See Appendix A – Figure 3 - Sample Location Map (Interior).] START members Mace and Shelat conducted a reconnaissance of the exterior of the building to establish the surface soil and subsurface soil sample locations using the Global Positioning System (GPS) Waypoint Navigation feature and using the GPS locations documented by Stone during the August 2005 sampling event. [See Appendix A – Figure 3A - Sample Location Map (Exterior).]

At the conclusion of the interior and exterior reconnaissance, 16 concrete floor sample locations, five wipe sample locations, 26 surface soil sample locations, and five subsurface soil sample locations were established for on-site PCB analysis, which was conducted by Stone.

START members Thompson and Ackerman collected the five wipe samples adjacent to the locations collected by Stone in August 2005 and delivered the samples to the on-site mobile laboratory. At the conclusion of the wipe sampling event, START member Ackerman began the collection of the concrete floor samples using a rotary hammer to drill cores in the concrete floor. Of the 16 concrete floor samples, START member Ackerman collected 13 due to the battery in the rotary hammer being discharged. The remaining three concrete samples were collected on 14 June 2006. Twenty-six surface soil and five subsurface soil samples were collected by START on 13 June 2006 and delivered to the on-site mobile laboratory.

Of the samples collected and analyzed on site, 10 percent of the samples were sent for confirmatory analysis at the U.S. EPA Office of Environmental Measurement and Evaluation (OEME) Laboratory, located in North Chelmsford, MA. All samples were delivered at the conclusion of site activities. (See Appendix C – Chain-of-Custody Record.)

On 17 July 2006, START received the analytical data results from OEME. These data are included in Appendix D - Analytical Data. In addition, PCB Screening Results for Floor and Wipe Samples, Surface Soil Samples, and Subsurface Soil Samples are depicted on Figures 4, 4A, and 4B, respectively.

III. Appendices

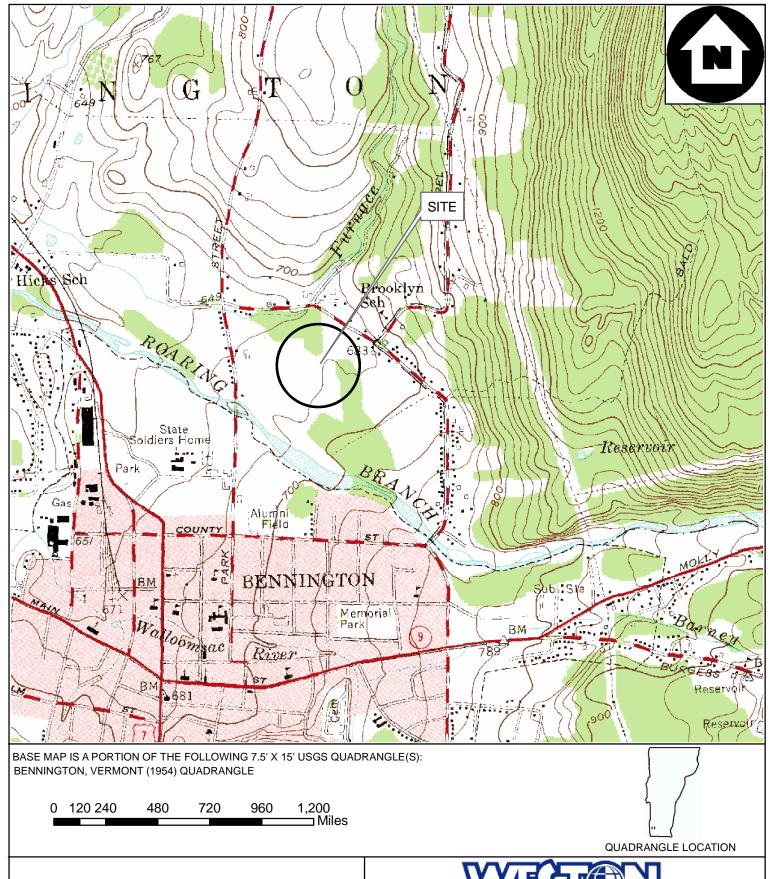
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Appendix A

Figures

Figure 1 – Site Location Map
Figure 2 – Site Diagram
Figure 3 – Sample Location Map (Interior)
Figure 3A – Sample Location Map (Exterior)
Figure 4 – PCB Screening Results, Floor and Wipe Samples (Interior)
Figure 4A – PCB Screening Results, Surface Soil Samples
Figure 4B – PCB Screening Results, Subsurface Soil Samples

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SITE LOCATION MAP

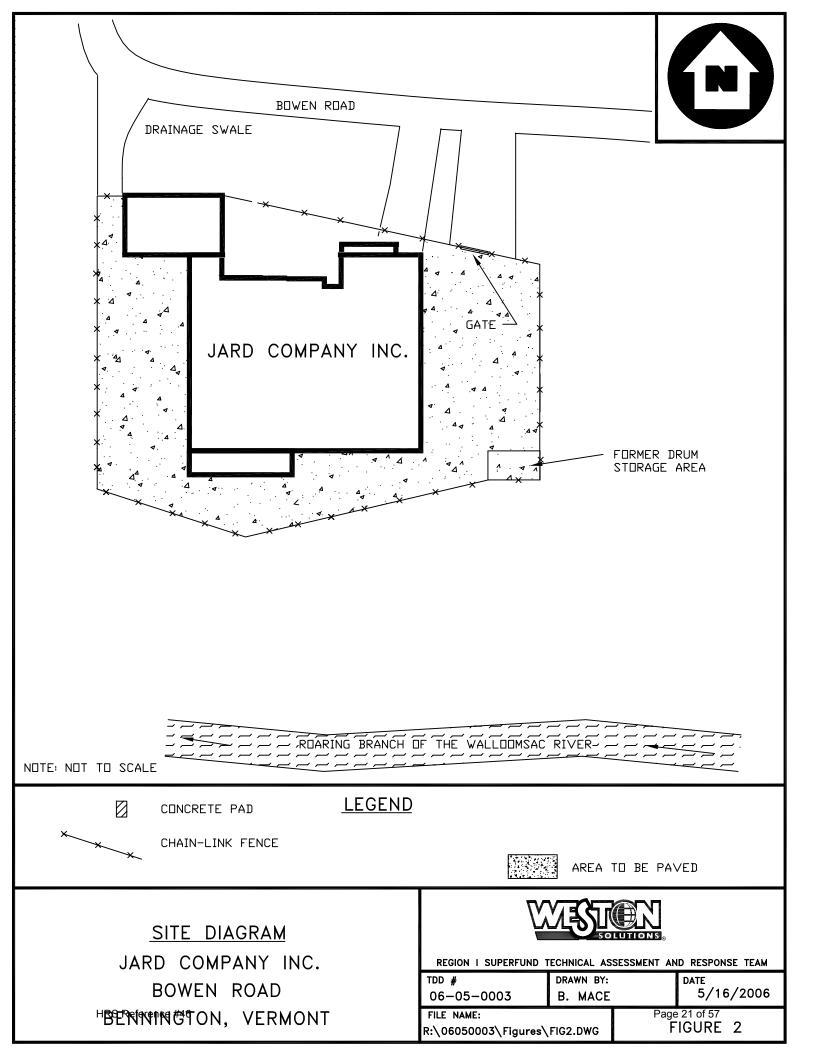
JARD COMPANY, INC. BOWEN ROAD BENNINGTON, VERMONT

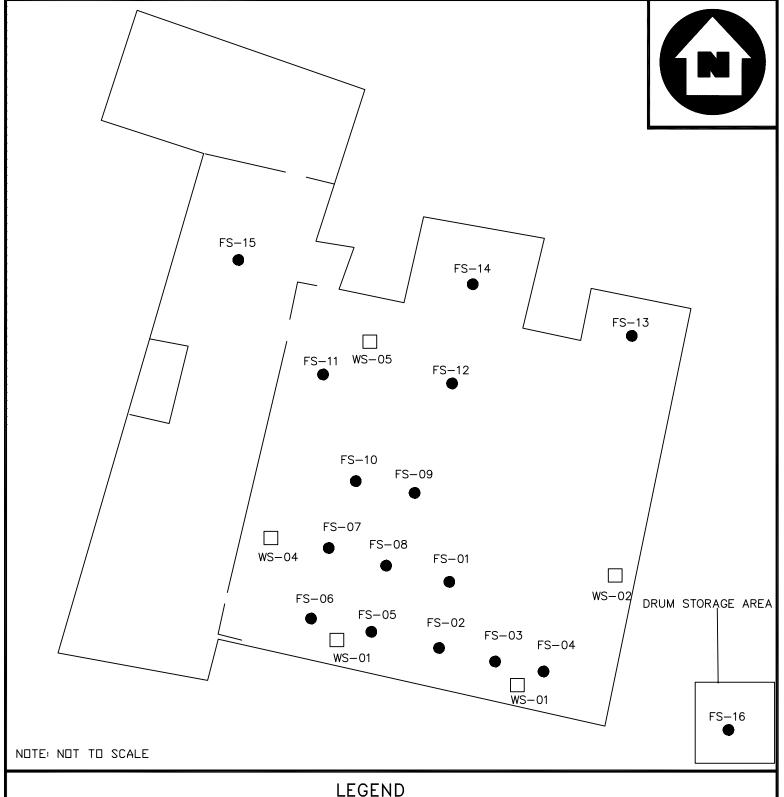
HRS Reference #46



REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

| L | | | | | | | | | |
|---|--|---------------------|------------------|--|--|--|--|--|--|
| F | TDD NUMBER: | CREATED BY: | CREATED ON: | | | | | | |
| | 06-05-0003 | A. THOMPSON | 06/06/2006 | | | | | | |
| | FILE LOCATION: E:\Vt_gis\JardCompan | y\MXDs\Figure 1.MXD | Page 20 FIGURE 1 | | | | | | |





LEGEND

- CONCRETE FLOOR SAMPLE LOCATION (NOTE: COLLECTED FROM 6 INCHES BELOW THE FLOOR USING A DRILL)
- WIPE SAMPLE LOCATION (NOTE: COLLECTED FROM 2 FEET ABOVE THE FLOOR ON THE WALL)

SAMPLE LOCATION MAP (INTERIOR)

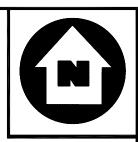
JARD COMPANY INC. **BOWEN ROAD** HBENNINGTON, VERMONT

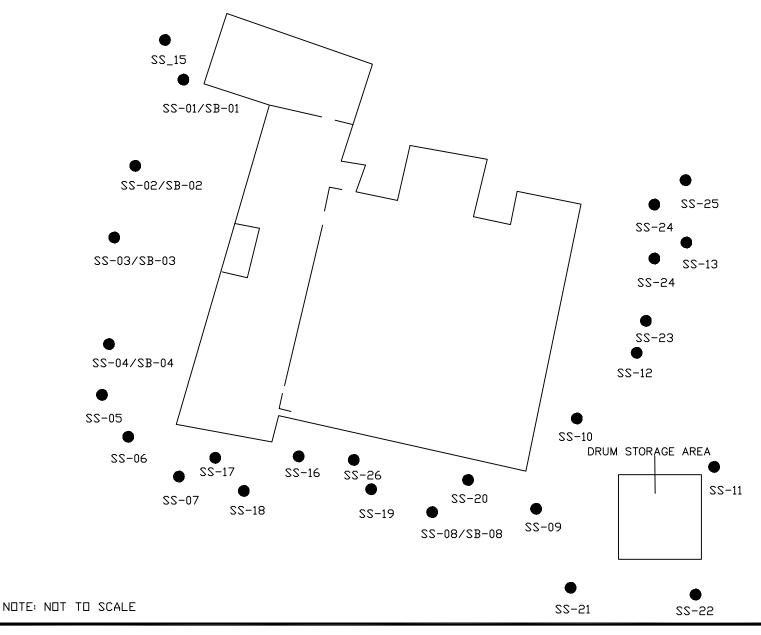


REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD # DRAWN BY: 6/30/06 06-05-0003 A.THOMPSON Page 22 of 57 FIGURE 3 FILE NAME:

R:\06050003\Figures\FIG3.DWG





LEGEND

SOIL SAMPLE LOCATION (NOTE: COLLECTED FROM 6 INCHES BELOW GROUND SURFACE)

SAMPLE LOCATION MAP (EXTERIOR)

JARD COMPANY INC. **BOWEN ROAD** HBENNINGTON, VERMONT

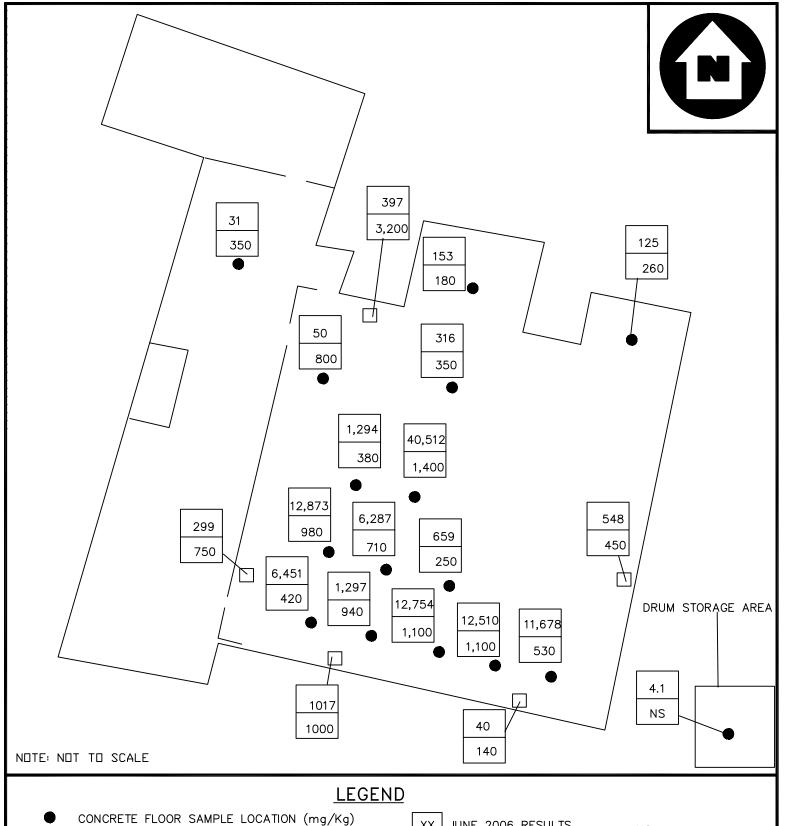


REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD # DRAWN BY: DATE 6/30/06 06-05-0003 A.THOMPSON FILE NAME:

R:\06050003\Figures\FIG3A.DWG

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- WIPE SAMPLE LOCATION (ug/100cm2)

JUNE 2006 RESULTS AUGUST 2005 RESULTS

NS NOT SAMPLED

SAMPLE RESULTS (INTERIOR)

JARD COMPANY INC. **BOWEN ROAD** HBENNINGTON, VERMONT

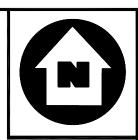


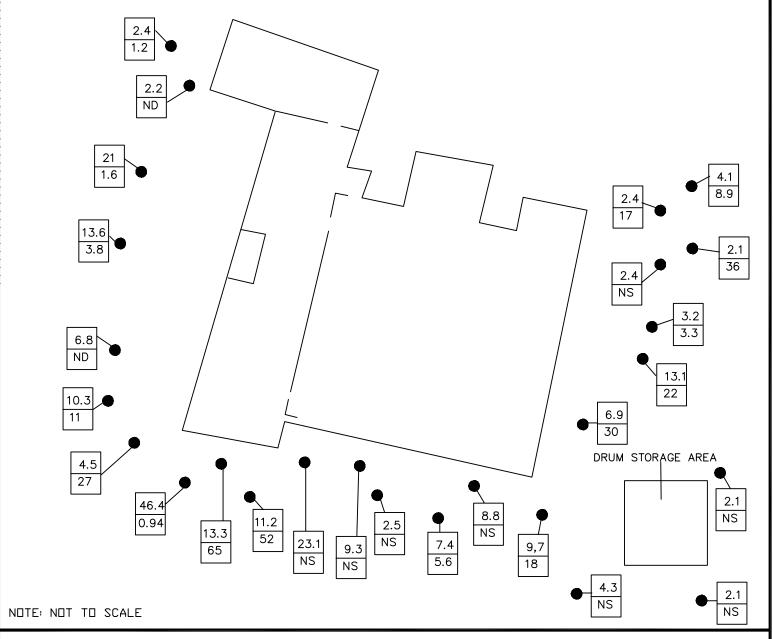
REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD # DRAWN BY: A.THOMPSON 06-05-0003

6/30/06

FILE NAME: $R:\06050003\$ Figures \FIG4.DWG Page 24 of 57 FIGURE 4





LEGEND

XX JUNE 2006 RESULTS
YY AUGUST 2005 RESULTS

NS NOT SAMPLED ND NON DETECT

SOIL SAMPLE LOCATION (mg/Kg)

SAMPLE RESULTS (EXTERIOR/SURFACE)

JARD COMPANY INC.

BOWEN ROAD

HEENWINGTON, VERMONT



REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

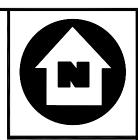
TDD # 06-05-0003 DRAWN BY: A.THOMPSON

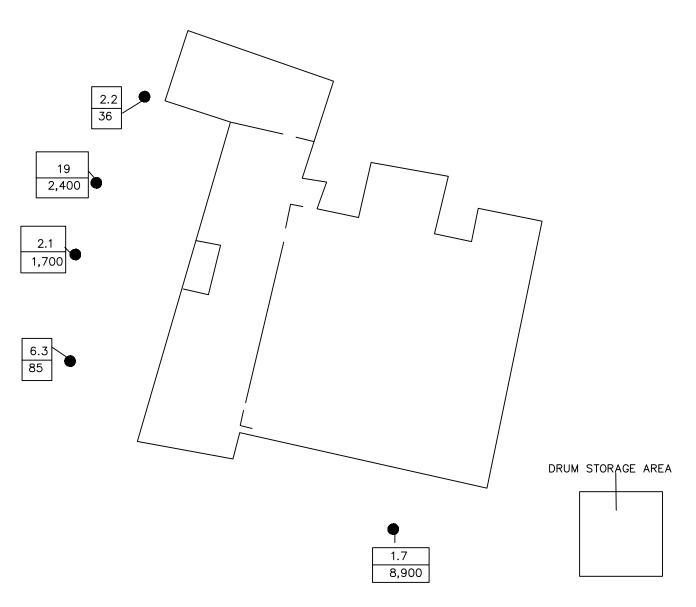
6/30/06

FILE NAME:

R:\06050003\Figures\FIG4A.DWG

Page 25 of 57 FIGURE 4A





NOTE: NOT TO SCALE

LEGEND

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JUNE 2006 RESULTS AUGUST 2005 RESULTS NS NOT SAMPLED ND NON DETECT

SOIL SAMPLE LOCATION (mg/Kg)

SAMPLE RESULTS (EXTERIOR/SUBSURFACE)

JARD COMPANY INC.

BOWEN ROAD

HERENINGTON, VERMONT



REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD # 06-05-0003

DRAWN BY: A.THOMPSON

6/30/06

FILE NAME:

R:\06050003\Figures\FIG4A.DWG

Page 26 of 57 FIGURE 4B

Appendix B

Photodocumentation Log

HRS Reference #46 Page 27 of 57



SCENE: View of the western side of the building. Photograph taken facing south.

DATE: 13 June 2006 **TIME:** 1530 hours

PHOTOGRAPHER: Bonnie Mace CAMERA: Nikon CoolPix 3100



SCENE: View of surface and subsurface soil sample location SS/SB-01. Photograph taken facing south.

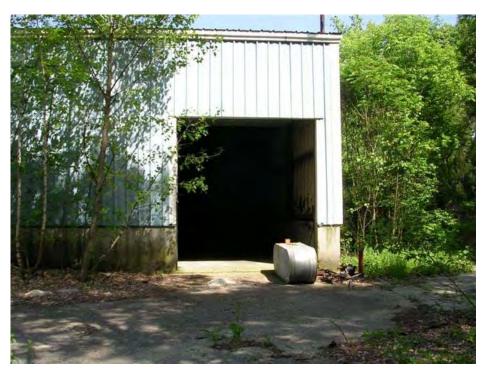
DATE: 13 June 2006 **TIME:** 1531 hours



SCENE: View of the western side of the building. Photograph taken facing southeast.

DATE: 13 June 2006 **TIME:** 1535 hours

PHOTOGRAPHER: Bonnie Mace CAMERA: Nikon CoolPix 3100



SCENE: View of the western side entrance of the building. Photograph taken facing east.

DATE: 13 June 2006 **TIME:** 1536 hours



SCENE: View of the garage bay area. Photograph taken facing east.

DATE: 13 June 2006 **TIME:** 1537 hours

PHOTOGRAPHER: Bonnie Mace CAMERA: Nikon CoolPix 3100



SCENE: View of the building interior.

DATE: 13 June 2006 **TIME:** 1538 hours



SCENE: View of the interior of the dry well and soil sample location SS-26.

DATE: 13 June 2006 **TIME:** 1543 hours

PHOTOGRAPHER: Bonnie Mace CAMERA: Nikon CoolPix 3100



SCENE: View of the dry well and soil sample location SS-26. Photograph taken facing north.

DATE: 13 June 2006 **TIME:** 1544 hours



SCENE: View of the southern side of the building. Photograph taken facing east.

DATE: 13 June 2006 **TIME:** 1545 hours

PHOTOGRAPHER: Bonnie Mace CAMERA: Nikon CoolPix 3100



SCENE: View of the southeast entrance of the building. Photograph taken facing west.

DATE: 13 June 2006 **TIME:** 1547 hours



SCENE: View of the drum storage area. Photograph taken facing southeast.

DATE: 13 June 2006 **TIME:** 1550 hours

PHOTOGRAPHER: Bonnie Mace CAMERA: Nikon CoolPix 3100



SCENE: View of the eastern side of the building. Photograph taken facing north.

DATE: 13 June 2006 **TIME:** 1552 hours



SCENE: View of the northeast entrance of the building. Photograph taken facing west.

DATE: 13 June 2006 **TIME:** 1555 hours

PHOTOGRAPHER: Bonnie Mace CAMERA: Nikon CoolPix 3100



SCENE: View of the building interior of the Production Area.

DATE: 13 June 2006 **TIME:** 1557 hours

Appendix C

Chain-of-Custody Record

HRS Reference #46 Page 35 of 57

START III

JARD COMPANY INC SITE

CHAIN OF CUSTODY RECORD

No: 0183-06/26/06-0002

Site #: 0183

EPA Contract Number: EP-W-05-042

Weston Solutions Inc.

| Lab# | Sample # | Location | Sample Time | Analyses | Collected | Matrix | Numb Cont | Container | Preservative | MS/MSE |
|------|-----------|----------|-------------|----------|-----------|--------|--------------|------------|--------------|--------|
| | 0183-0001 | WS-01 | 10:10 | PCBs | 6/13/2006 | | 1 | 40 mL | Hexane | N |
| | 0183-0002 | WS-02 | 10:15 | PCBs | 6/13/2006 | | 1 | 40 mL | Hexane | N |
| | 0183-0003 | WS-03 | 10:20 | PCBs | 6/13/2006 | | 1 | 40 mL | Hexane | N |
| | 0183-0004 | WS-04 | 10:25 | PCBs | 6/13/2006 | | 1 | 40 mL | Hexane | N |
| | 0183-0005 | WS-05 | 10:35 | PCBs | 6/13/2006 | | 1 | 40 mL | Hexane | N |
| | 0183-0006 | WS-Blank | 10:35 | PCBs | 6/13/2006 | | 1 | 40 mL | Hexane | N |
| | 0183-0007 | SS-01 | 11:15 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0008 | SS-02 | 11:15 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0009 | SS-03 | 11:15 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0010 | SS-04 | 11:20 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0011 | SS-05 | 11:20 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0012 | SS-06 | 11:20 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0013 | SS-07 | 11:25 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0014 | SS-08 | 11:25 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0015 | SS-09 | 11:25 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0016 | SS-10 | 11:30 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0017 | SS-11 | 11:30 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0018 | SS-12 | 11:30 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0019 | SS-13 | 11:35 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |

| | SAMPLES TRANSFERRED FROM |
|-----------------------|--------------------------|
| Special Instructions: | CHAIN OF CUSTODY # |
| | |

| Items/Reason | Relinquished by | Date | Received by | Date | Time | Items/Reason | Relinquished By | Date | Received by | Date | Time |
|--------------|-----------------|------|-------------|------|------|--------------|-----------------|------|-------------|------|------|
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START III

JARD COMPANY INC SITE

CHAIN OF CUSTODY RECORD

No: 0183-06/26/06-0002

Site #: 0183

EPA Contract Number: EP-W-05-042

Weston Solutions Inc.

| Lab # | Sample # | Location | Sample Time | Analyses | Collected | Matrix | Numb Cont | Container | Preservative | MS/MSD |
|-------|-----------|---------------|-------------|----------|-----------|--------|--------------|------------|--------------|--------|
| | 0183-0020 | SS-14 | 11:35 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0021 | SS-15 | 11:35 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0022 | SS-16 | 11:40 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0023 | SS-17 | 11:40 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0024 | SS-18 | 11:40 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0025 | SS-19 | 11:45 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0026 | SS-20 | 11:45 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0027 | SS-21 | 11:45 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0028 | SS-22 | 11:50 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0029 | SS-23 | 11:55 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0030 | SS-26 | 15:15 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0031 | SS-24 | 11:55 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0032 | SS-25 | 11:55 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0033 | Drill Rinsate | 12:00 | PCBs | 6/13/2006 | | 1 | 40 mL | Hexane | N |
| | 0183-0034 | SB-01 | | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0035 | SB-02 | 14:20 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0036 | SB-03 | 14:45 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0037 | SB-04 | 14:50 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |
| | 0183-0038 | SB-08 | 15:00 | PCBs | 6/13/2006 | Soil | 1 | 1-poly bag | 4 C | N |

| | SAMPLES TRANSFERRED FROM |
|-----------------------|--------------------------|
| Special Instructions: | CHAIN OF CUSTODY # |
| | |

| Items/Reason | Relinquished by | Date | Received by | Date | Time | Items/Reason | Relinquished By | Date | Received by | Date | Time |
|--------------|-----------------|------|-------------|------|------|--------------|-----------------|------|-------------|------|------|
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START III

JARD COMPANY INC SITE

CHAIN OF CUSTODY RECORD

Site #: 0183

No: 0183-06/26/06-0002

EPA Contract Number: EP-W-05-042

Weston Solutions Inc.

| Lab# | Sample # | Location | Sample Time | Analyses | Collected | Matrix | Numb Cont | Container | Preservative | MS/MSD |
|------|-----------|----------|-------------|----------|-----------|----------|--------------|------------|--------------|--------|
| | 0183-0039 | FS-11 | 11:45 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0040 | FS-12 | 12:00 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0041 | FS-13 | 12:15 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0042 | FS-14 | 12:30 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0043 | FS-15 | 12:30 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0044 | FS-01 | 14:30 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0045 | FS-05 | 14:45 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0046 | FS-09 | 13:30 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0047 | FS-06 | | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0048 | FS-07 | 13:00 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0049 | FS-08 | 15:30 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0050 | FS-02 | 15:45 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0051 | FS-10 | 14:30 | PCBs | 6/13/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0055 | FS-03 | 07:45 | PCBs | 6/14/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0056 | FS-04 | 07:55 | PCBs | 6/14/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | 0183-0057 | FS-16 | 08:10 | PCBs | 6/14/2006 | Concrete | 1 | 1-poly bag | 4 C | N |
| | | | | | | | | | | |

| | SAMPLES TRANSFERRED FROM |
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| Special Instructions: | CHAIN OF CUSTODY # |
| | |

| Items/Reason | Relinquished by | Date | Received by | Date | Time | Items/Reason | Relinquished By | Date | Received by | Date | Time |
|--------------|-----------------|------|-------------|------|------|--------------|-----------------|------|-------------|------|------|
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Appendix D

Analytical Data

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Field Screening Data

HRS Reference #46 Page 40 of 57



STONE ENVIRONMENTAL INC

Onsite Laboratory Results Sheet

VT DEC Client:

Location: Bennington, Vermont Project ID: Jard Onsite PCB Lab

SEI#: 06-1782 Date(s) Sampled: 6/13/2006 Date(s) Analyzed: 6/13/06 - 6/15/06

Test Method: EPA8082 Report Date: 6/26/2006

| Sample | Soil Mass (dry) | % moisture | Dilution factor | Result mg/k | Result | Surrogate % Recovery | Aroclor |
|-------------------|--------------------|----------------|-----------------|-------------|-----------|-------------------------|----------------|
| Campic | (di y) | 70 IIIOIOtai C | Wipe sa | | ug/ 1000m | recovery | 7 (1 0 0 1 0 1 |
| ws-blank | NA | NA | 1 1 | NA | 40 U | 70 | 1248 |
| ws-blank ws-01 | NA NA | NA NA | 10 | NA NA | 548 | 140 | 1248 |
| ws-01 ws-02 | NA NA | NA NA | 10 | NA NA | 1017 | 120 | 1248 |
| ws-02 ws-03 | NA NA | NA NA | 10 | NA NA | 299 | 120 | 1248 |
| ws-03 ws-04 | NA NA | NA NA | 10 | NA NA | 397 | 120 | 1248 |
| ws-04 ws-05 | NA NA | NA NA | 10 | NA NA | 113 | 120 | 1248 |
| W3-00 | IVA | IVA | Soil Sai | | 110 | 120 | 1240 |
| ss-01 | 9.31 | 5% | 10 | | U NA | 110 | 1248 |
| ss-01 ss-02 | 9.04 | 9% | 10 | 21.0 | NA NA | 110 | 1248 |
| ss-02 ss-03 | 9.34 | 5% | 10 | 13.6 | NA NA | 120 | 1248 |
| ss-03 ss-04 | 8.79 | 8% | 10 | 6.8 | NA NA | 120 | 1248 |
| ss-0 4 | 8.98 | 9% | 10 | 10.3 | NA NA | 120 | 1248 |
| ss-06 | 8.79 | 10% | 10 | 4.5 | NA NA | 120 | 1248 |
| ss-07 | 8.9 | 8% | 10 | 46.4 | NA NA | 110 | 1248 |
| ss-08 | 9.27 | 7% | 10 | 7.4 | NA NA | 130 | 1248 |
| ss-09 | 9.28 | 7% | 10 | 9.7 | NA NA | 130 | 1248 |
| ss-10 | 9.47 | 4% | 10 | 6.9 | NA | 130 | 1248 |
| ss-11 | 8.97 | 5% | 10 | | U NA | 110 | 1248 |
| ss-12 | 6.72 | 29% | 10 | 13.1 | NA | 110 | 1248 |
| ss-13 | 9.23 | 8% | 10 | | U NA | 90 | 1248 |
| ss-14 | 9.26 | 9% | 10 | | U NA | 90 | 1248 |
| ss-15 | 7.92 | 20% | 10 | | U NA | 100 | 1248 |
| ss-16 | 8.88 | 11% | 10 | 23.1 | NA | 110 | 1248 |
| ss-17 | 9.15 | 9% | 10 | 13.3 | NA | 100 | 1248 |
| ss-18 | 8.17 | 18% | 10 | 11.2 | NA | 90 | 1248 |
| ss-19 | 8.36 | 17% | 10 | 2.5 | U NA | 100 | 1248 |
| ss-20 | 9.01 | 10% | 10 | 8.8 | NA | 110 | 1248 |
| ss-21 | 9.14 | 8% | 10 | 4.3 | NA | 94 | 1248 |
| ss-22 | 9.28 | 6% | 10 | 2.1 | U NA | 97 | 1248 |
| ss-23 | 9.04 | 9% | 10 | 3.2 | NA | 93 | 1248 |
| ss-24 | 8.88 | 11% | 10 | 2.4 | U NA | 88 | 1248 |
| ss-25 | 7.57 | 23% | 10 | 4.1 | NA | 84 | 1248 |
| ss-26 | 7.83 | 22% | 10 | 9.3 | NA | 86 | 1248 |
| sb-01 | 9.16 | 9% | 10 | | U NA | 94 | 1248 |
| sb-02 | 9.25 | 8% | 10 | 19.0 | NA | 97 | 1248 |
| sb-03 | 9.34 | 7% | 10 | | U NA | 72 | 1248 |
| sb-04 | 8.95 | 10% | 10 | 6.3 | NA | 60 | 1248 |
| sb-08 | 8.36 | 16% | 10 | 1.7 | NA | 85 | 1248 |

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Onsite Laboratory Results Sheet

Client: VT DEC

Location: Bennington, Vermont
Project ID: Jard Onsite PCB Lab

 SEI #:
 06-1782

 Date(s) Sampled:
 6/13/2006

 Date(s) Analyzed:
 6/13/06 - 6/15/06

Test Method: EPA8082 Report Date: 6/26/2006

| Sample | Soil Mass (dry) | % moisture | Dilution factor | Result mg dry | /Kg | Result ug/ 100cm ² | Surrogate % Recovery | Aroclor | | |
|---------------|--------------------|------------|-----------------|------------------|-----|----------------------------------|-------------------------|---------|--|--|
| Floor samples | | | | | | | | | | |
| fs-01 | NA | NA | 100 | 659 | | NA | NQ | 1242 | | |
| fs-02 | NA | NA | 1000 | 12,754 | Е | NA | NQ | 1242 | | |
| fs-03 | NA | NA | 10000 | 12,510 | | NA | NQ | 1242 | | |
| fs-04 | NA | NA | 100 | 11,678 | Е | NA | NQ | 1242 | | |
| fs-05 | NA | NA | 100 | 1,297 | Ε | NA | NQ | 1242 | | |
| fs-06 | NA | NA | 1000 | 6,451 | | NA | NQ | 1242 | | |
| fs-07 | NA | NA | 1000 | 12,873 | | NA | NQ | 1242 | | |
| fs-08 | NA | NA | 1000 | 6,287 | | NA | NQ | 1242 | | |
| fs-09 | NA | NA | 10000 | 40,512 | | NA | NQ | 1242 | | |
| fs-10 | NA | NA | 1000 | 1,294 | | NA | NQ | 1242 | | |
| fs-11 | NA | NA | 10 | 50 | | NA | 80 | 1242 | | |
| fs-12 | NA | NA | 1000 | 316 | | NA | NQ | 1242 | | |
| fs-13 | NA | NA | 100 | 125 | | NA | NQ | 1242 | | |
| fs-14 | NA | NA | 100 | 153 | | NA | NQ | 1242 | | |
| fs-15 | NA | NA | 100 | 31 | | NA | NQ | 1242 | | |
| fs-16 | NA | NA | 10 | 4.1 | | NA | 53 | 1242 | | |
| • | | • | Misc. sa | mples | | • | | | | |
| drill rinsate | NA | NA | 1 | NA | | 40 U | 62 | 1242 | | |

U = Not detected above the specified reporting limit.

E = Estimated value, marginally above the calibration levels

NA = Not applicable to sample

NQ = Surrogate recovery not quantitated due to necessary dilution of surrogate

Confirmatory Analytical Data

HRS Reference #46 Page 43 of 57



United States Environmental Protection Agency Office of Environmental Measurement & Evaluation 11 Technology Drive North Chelmsford, MA 01863-2431

Laboratory Report

June 24, 2006

Allen Jarrell - HBR
US EPA New England Region 1
One Congress Street
Boston, MA 02114 - 2023

Project Number: 06060030

Project: Jard Company Inc. - Bennington, VT

Analysis: PCBs Medium Level in Soils and Sediments

Analyst: Paul Carroll Warrell 6. VI.06

Analytical Procedure:

All samples were received and logged in by the laboratory according to the USEPA New England Laboratory SOP for Sample Log-in.

Sample preparation and analysis was done following the EPA Region I SOP, PESTSOIL2.SOP.

The analysis was performed using high resolution capillary column chromatography on an Agilent 6890 Series gas chromatograph equipped with dual electron capture detectors. The 30 meter dual capillary column system consists of a J&W DB-5 and J&W DB-1701, both with 0.25mm ID and 0.25 micron film thickness.

The results are reported on a dry weight basis.

Date Samples Received by the Laboratory: 6/14/06

Results relate only to the items tested or to the samples as received by the Laboratory. This analytical report shall not be reproduced except in full, without written approval of the laboratory.

Report may contain multiple sections and each section will be numbered independently.

If you have any questions please call me at 617-918-8340.

nut W Sundean 6/28/06

Sincerely.

Daniel N. Boudreau Chemistry Team Leader

| Qualifiers | RL | Reporting limit |
|------------|--------------|---|
| | ND | Not Detected above Reporting limit |
| | NA | Not Applicable due to high sample dilutions or sample interferences |
| | J | Estimated value |
| | \mathbf{E} | Estimated value exceeds the calibration range |
| | ${f L}$ | Estimated value is below the calibration range |
| | В | Analyte is associated with the lab blank or trip blank contamination. Values are qualified when the observed concentration of the contamination in the sample extract is less than 10 times the concentration in the blank. |
| | P | The confirmation value exceeded 35% difference and is less than 100%. The lower value is reported. |
| 4 | \mathbf{C} | The identification has been confirmed by GC/MS. |
| | R | No recovery was calculated since the analyte concentration is greater than four times the spike level. |

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Jard Company Inc. - Bennington, VT

PCBs Medium Level in Soils and Sediments

Client Sample ID: D19472

Date of Collection: 6/13/2006

Date of Extraction: 6/14/06

Date of Analysis: 6/23/06

Dry Weight Extracted: 4.61 grams

Lab Sample ID: AA61534

Matrix
Final Volume:

Soil 5 mL

Percent Solids:

91%

Extract Dilution: 2

Wet Weight Extracted: 5.04 grams

| | | Concentration | RL | |
|------------|--------------|---------------|-------|-----------|
| CAS Number | Compound | mg/Kg | mg/Kg | Qualifier |
| 12674-11-2 | Aroclor-1016 | ND | 0.22 | |
| 11104-28-2 | Aroclor-1221 | ND | 0.22 | |
| 11141-16-5 | Aroclor-1232 | ND | 0.22 | |
| 53469-21-9 | Aroclor-1242 | 0.45 | 0.22 | |
| 12672-29-6 | Aroclor-1248 | ND | 0.22 | |
| 11097-69-1 | Aroclor-1254 | ND | 0.22 | |
| 11096-82-5 | Aroclor-1260 | ND | 0.22 | |
| 11100-14-4 | Aroclor-1262 | ND | 0.22 | |
| 37324-23-5 | Aroclor-1268 | ND | 0.22 | |

| Surrogate Compounds | Recoveries (%) | QC Ranges |
|------------------------------|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | 62 | 36 - 131 |
| Decachlorobiphenyl | 97 | 30 - 165 |

Comments: The GC trace for this sample most closely matched that of Aroclor 1242. However the pattern was not an exact match and showed a weathered pattern.

Jard Company Inc. - Bennington, VT

PCBs Medium Level in Soils and Sediments

Client Sample ID: D19473 Date of Collection: 6/13/2006 Date of Extraction: 6/14/06 Date of Analysis: 6/23/06 Dry Weight Extracted: 4.44 grams Wet Weight Extracted: 5.06 grams

AA61535 Lab Sample ID:

Matrix

Soil

Final Volume:

5 mL

Percent Solids:

88%

Extract Dilution: 20

| CAS Number | Compound | Concentration mg/Kg | RL mg/Kg | Qualifier |
|------------|--------------|------------------------|-------------|-----------|
| 12674-11-2 | Aroclor-1016 | ND | 2.20 | |
| 11104-28-2 | Aroclor-1221 | ND | 2.20 | |
| 11141-16-5 | Aroclor-1232 | ND | 2.20 | |
| 53469-21-9 | Aroclor-1242 | 11 | 2.20 | |
| 12672-29-6 | Aroclor-1248 | ND | 2.20 | |
| 11097-69-1 | Aroclor-1254 | ND | 2.20 | |
| 11096-82-5 | Aroclor-1260 | ND | 2.20 | |
| 11100-14-4 | Aroclor-1262 | ND | 2.20 | |
| 37324-23-5 | Aroclor-1268 | ND | 2.20 | |

| Surrogate Compounds | Recoveries (%) | QC Ranges |
|------------------------------|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | 82 | 36 - 131 |
| Decachlorobiphenyl | 126 | 30 - 165 |

Comments: The GC trace for this sample most closely matched that of Aroclor 1242. However the pattern was not an exact match and showed a weathered pattern.

The surrogate recoveries are estimated, the 20X dilution brought the values below the calibration curve.

Jard Company Inc. - Bennington, VT

PCBs Medium Level in Soils and Sediments

Client Sample ID: D19474 AA61536 Lab Sample ID: Date of Collection: 6/13/2006 Matrix Soil Date of Extraction: 6/14/06 Final Volume: 5 mL Date of Analysis: 6/23/06 92% Percent Solids: Dry Weight Extracted: 4.68 grams Extract Dilution: 1

Wet Weight Extracted: 5.07 grams

| | | Concentration | \mathbf{RL} | |
|------------|--------------|---------------|---------------|-----------|
| CAS Number | Compound | mg/Kg | mg/Kg | Qualifier |
| 12674-11-2 | Aroclor-1016 | ND | 0.11 | |
| 11104-28-2 | Aroclor-1221 | ND | 0.11 | |
| 11141-16-5 | Aroclor-1232 | ND | 0.11 | |
| 53469-21-9 | Aroclor-1242 | 1.6 | 0.11 | |
| 12672-29-6 | Aroclor-1248 | ND | 0.11 | |
| 11097-69-1 | Aroclor-1254 | ND | 0.11 | |
| 11096-82-5 | Aroclor-1260 | 0.33 | 0.11 | |
| 11100-14-4 | Aroclor-1262 | ND | 0.11 | |
| 37324-23-5 | Aroclor-1268 | ND | 0.11 | |

| Surrogate Compounds | Recoveries (%) | QC Ranges |
|------------------------------|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | 77 | 36 - 131 |
| Decachlorobiphenyl | 95 | 30 - 165 |

Comments: The GC trace for this sample most closely matched that of Aroclor 1242. However the pattern was not an exact match and showed a weathered pattern.

Jard Company Inc. - Bennington, VT

PCBs Medium Level in Soils and Sediments

D19475 Client Sample ID: 6/13/2006 Date of Collection: Date of Extraction: 6/14/06 Date of Analysis: 6/23/06 Dry Weight Extracted: 4.22 grams Lab Sample ID: AA61537

Soil Matrix

Final Volume: 5 mL

Percent Solids:

84%

Extract Dilution: 2

Wet Weight Extracted: 5.01 grams

| CAS Number | Compound | Concentration mg/Kg | RL mg/Kg | Qualifier |
|------------|--------------|---------------------|-------------|-----------|
| 12674-11-2 | Aroclor-1016 | ND | 0.24 | |
| 11104-28-2 | Aroclor-1221 | ND | 0.24 | |
| 11141-16-5 | Aroclor-1232 | ND | 0.24 | |
| 53469-21-9 | Aroclor-1242 | 1.4 | 0.24 | P |
| 12672-29-6 | Aroclor-1248 | ND | 0.24 | , |
| 11097-69-1 | Aroclor-1254 | ND | 0.24 | |
| 11096-82-5 | Aroclor-1260 | ND | 0.24 | |
| 11100-14-4 | Aroclor-1262 | ND | 0.24 | |
| 37324-23-5 | Aroclor-1268 | ND , | 0.24 | |

| Surrogate Compounds | Recoveries (%) | QC Ranges |
|------------------------------|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | 82 | 36 - 131 |
| Decachlorobiphenyl | 111 | 30 - 165 |

Comments: The GC trace for this sample most closely matched that of Aroclor 1242. However the pattern was not an exact match and showed a weathered pattern.

> P =The % difference between the primary and confirmation columns was greater than 35% (62%), the lower value was reported. The values were 2.7 mg/Kg DB-5 column and 1.4 mg/Kg DB-1701 column.

Jard Company Inc. - Bennington, VT

PCBs Medium Level in Soils and Sediments

Client Sample ID: D19476 AA61538 Lab Sample ID: Date of Collection: 6/13/2006 Matrix Concrete Date of Extraction: 6/14/06 5 mL Final Volume: Date of Analysis: 6/23/06 Percent Solids: 94% Dry Weight Extracted: 4.76 grams Extract Dilution: 20,000

Wet Weight Extracted: 5.04 grams

| | ~ , | Concentration | RL | O 116 |
|------------|--------------|---------------|--------|-----------|
| CAS Number | Compound | mg/Kg | mg/Kg | Qualifier |
| 12674-11-2 | Aroclor-1016 | 32,000 | 210.00 | |
| 11104-28-2 | Aroclor-1221 | ND | 210.00 | |
| 11141-16-5 | Aroclor-1232 | ND | 210.00 | |
| 53469-21-9 | Aroclor-1242 | ND | 210.00 | |
| 12672-29-6 | Aroclor-1248 | ND | 210.00 | |
| 11097-69-1 | Aroclor-1254 | ND | 210.00 | |
| 11096-82-5 | Aroclor-1260 | ND | 210.00 | |
| 11100-14-4 | Aroclor-1262 | ND | 210.00 | |
| 37324-23-5 | Aroclor-1268 | ND | 210.00 | |

| Surrogate Compounds | * | Recoveries (%) | QC Ranges |
|------------------------------|---|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | | NA | 36 - 131 |
| Decachlorobiphenyl | | NA | 30 - 165 |

Comments:

This sample was an exact match with Aroclor 1016. Aroclor 1016 is very similar in composition to Aroclor 1242, and some laboratories report them out as a common analyte ie: 1016/1242

Surrogate recoveries could not be determined due to sample dilution.

Jard Company Inc. - Bennington, VT

PCBs Medium Level in Soils and Sediments

Client Sample ID: D19477 Date of Collection: 6/13/2006 Date of Extraction: 6/14/06 Date of Analysis: 6/23/06 Dry Weight Extracted: 4.84 grams Wet Weight Extracted: 5.04 grams

Matrix Concrete 5 mL Final Volume: Percent Solids: 96% Extract Dilution: 20,000

Lab Sample ID:

AA61539

| CAS Number | Compound | Concentration mg/Kg | RL mg/Kg | Qualifier |
|------------|--------------|---------------------|-------------|-----------|
| 12674-11-2 | Aroclor-1016 | 19,000 | 210.00 | |
| 11104-28-2 | Aroclor-1221 | ND | 210.00 | |
| 11141-16-5 | Aroclor-1232 | ND | 210.00 | |
| 53469-21-9 | Aroclor-1242 | ND | 210.00 | |
| 12672-29-6 | Aroclor-1248 | ND | 210.00 | |
| 11097-69-1 | Aroclor-1254 | ND | 210.00 | |
| 11096-82-5 | Aroclor-1260 | ND | 210.00 | |
| 11100-14-4 | Aroclor-1262 | ND | 210.00 | |
| 37324-23-5 | Aroclor-1268 | ND | 210.00 | |

| Surrogate Compounds | Recoveries (%) | QC Ranges |
|------------------------------|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | NA | 36 - 131 |
| Decachlorobiphenyl | NA | 30 - 165 |

Comments: This sample was an exact match with Aroclor 1016. Aroclor 1016 is very similar in composition to Aroclor 1242, and some laboratories report them out as a common analyte ie: 1016/1242

Surrogate recoveries could not be determined due to sample dilution.

Jard Company Inc. - Bennington, VT

PCBs Medium Level in Soils and Sediments

Client Sample ID: D19478 AA61540 Lab Sample ID: Date of Collection: 6/13/2006 Matrix Soil Date of Extraction: 6/14/06 Final Volume: 5 mL Date of Analysis: 6/23/06 Percent Solids: 100% Dry Weight Extracted: 5.04 grams Extract Dilution: 100 Wet Weight Extracted: 5.06 grams

| CAS Number | Compound | Concentration mg/Kg | RL mg/Kg | Qualifier |
|------------|--------------|------------------------|-------------|-----------|
| 12674-11-2 | Aroclor-1016 | ND | 9.90 | |
| 11104-28-2 | Aroclor-1221 | ND | 9.90 | |
| 11141-16-5 | Aroclor-1232 | ND | 9.90 | |
| 53469-21-9 | Aroclor-1242 | ND | 9.90 | |
| 12672-29-6 | Aroclor-1248 | ND | 9.90 | |
| 11097-69-1 | Aroclor-1254 | ND | 9.90 | |
| 11096-82-5 | Aroclor-1260 | 190 | 9.90 | |
| 11100-14-4 | Aroclor-1262 | ND | 9.90 | |
| 37324-23-5 | Aroclor-1268 | ND | 9.90 | |

| Surrogate Compounds | Recoveries (%) | QC Ranges |
|------------------------------|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | NA | 36 - 131 |
| Decachlorobiphenyl | NA | 30 - 165 |

Comments: Surrogate recoveries could not be determined due to sample dilution.

This sample was a PE sample, TT02829.

Jard Company Inc. - Bennington, VT

PCBs Medium Level in Soils and Sediments

Client Sample ID: D19479

Date of Collection: 6/13/2006

Date of Extraction: 6/14/06

Date of Analysis: 6/23/06

Dry Weight Extracted: 5.01 grams

Wet Weight Extracted: 5.04 grams

Lab Sample ID: AA61541

Matrix Soil

Final Volume: 5 mL

Percent Solids: 99%

Extract Dilution: 10

| CAS Number | Compound | Concentration mg/Kg | RL mg/Kg | Qualifier |
|------------|--------------|------------------------|-------------|-----------|
| 12674-11-2 | Aroclor-1016 | ND | 1.00 | |
| 11104-28-2 | Aroclor-1221 | ND | 1.00 | |
| 11141-16-5 | Aroclor-1232 | ND | 1.00 | |
| 53469-21-9 | Aroclor-1242 | ND | 1.00 | • |
| 12672-29-6 | Aroclor-1248 | 5.1 | 1.00 | |
| 11097-69-1 | Aroclor-1254 | ND | 1.00 | |
| 11096-82-5 | Aroclor-1260 | ND | 1.00 | |
| 11100-14-4 | Aroclor-1262 | ND | 1.00 | |
| 37324-23-5 | Aroclor-1268 | ND | 1.00 | |

| Surrogate Compounds | Recoveries (%) | QC Ranges |
|------------------------------|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | 91 | 36 - 131 |
| Decachlorobiphenyl | 107 | 30 - 165 |

Comments: This sample was a PE sample TT01321.

Jard Company Inc. - Bennington, VT

PCBs Medium Level in Soils and Sediments

Client Sample ID: D19480

Date of Collection: 6/13/2006

Date of Extraction: 6/14/06

Date of Analysis: 6/23/06

Dry Weight Extracted: 5.02 grams

Lab Sample ID: AA61542

Matrix

Soil

Final Volume:

5 mL

Percent Solids:

99%

Extract Dilution: 1

Wet Weight Extracted: 5.05 grams

| | | Concentration | RL | |
|------------|--------------|---------------|-------|-----------|
| CAS Number | Compound | mg/Kg | mg/Kg | Qualifier |
| 12674-11-2 | Aroclor-1016 | ND | 0.10 | |
| 11104-28-2 | Aroclor-1221 | ND | 0.10 | |
| 11141-16-5 | Aroclor-1232 | ND | 0.10 | |
| 53469-21-9 | Aroclor-1242 | ND | 0.10 | |
| 12672-29-6 | Aroclor-1248 | ND | 0.10 | |
| 11097-69-1 | Aroclor-1254 | 1.0 | 0.10 | |
| 11096-82-5 | Aroclor-1260 | ND | 0.10 | |
| 11100-14-4 | Aroclor-1262 | ND | 0.10 | |
| 37324-23-5 | Aroclor-1268 | ND | 0.10 | |

| Surrogate Compounds | Recoveries (%) | QC Ranges |
|------------------------------|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | 88 | 36 - 131 |
| Decachlorobiphenyl | 125 | 30 - 165 |

Comments: This sample was a PE sample TT2222

Jard Company Inc. - Bennington, VT

Laboratory Blank

Client Sample ID:

N/A

Lab Sample ID:

N/A

Date of Collection:

N/A 6/14/06

Matrix

Soil

Date of Extraction:

Final Volume:

5 mL

Date of Analysis:

6/20/06

Percent Solids:

100%

Dry Weight Extracted: 5.71 grams

Extract Dilution: 1

Wet Weight Extracted: 5.71 grams

Concentration RL**CAS Number** Compound mg/Kg mg/Kg Qualifier Aroclor-1016 12674-11-2 ND 0.09 11104-28-2 Aroclor-1221 ND 0.09 11141-16-5 Aroclor-1232 ND 0.09 53469-21-9 Aroclor-1242 ND 0.09 Aroclor-1248 12672-29-6 ND 0.09 Aroclor-1254 11097-69-1 ND 0.09 11096-82-5 Aroclor-1260 0.09 ND 11100-14-4 Aroclor-1262 0.09 ND Aroclor-1268 37324-23-5 ND 0.09

| Surrogate Compounds | Recoveries (%) | QC Ranges |
|------------------------------|----------------|-----------|
| 2,4,5,6-Tetrachloro-m-xylene | 54 | 36 - 131 |
| Decachlorobiphenyl | 100 | 30 - 165 |

Comments:

PCB MATRIX SPIKE (MS) / MATRIX SPIKE DUPLICATE (MSD) RECOVERY

Baldwinville Residential Properties

Sample ID: AA61442

| PARAMETER | SPIKE | SAMPLE | MS | MS | QC |
|--------------|-------|---------------|---------------|-------|----------|
| | ADDED | CONCENTRATION | CONCENTRATION | % | LIMITS |
| | mg/Kg | mg/Kg | mg/Kg | REC | (% REC) |
| Aroclor-1254 | 0.63 | ND | 0.572 | 91.37 | 70 - 130 |

| PARAMETER | MSD SPIKE ADDED | MSD CONCENTRATION mg/Kg | MSD % REC | RPD % | QC LIMITS RPD |
|--------------|-----------------------|-------------------------------|-----------------|----------|---------------------|
| Aroclor-1254 | 0.65 | 0.620 | 94.80 | 4 | |

Samples in Batch: AA61439, AA61440, AA61441, AA61442

Comments: The Jard Company, Inc. samples (PN06060030) were extracted with samples from the above referenced project (PN06060027) and these QC sample results are shared by both projects. Jard samples in this batch included AA61534, AA61535, AA61536, AA61537, AA61538, AA61539, AA61540, AA61541, AA61542.

LABORATORY DUPLICATE RESULTS

Baldwinville Residential Properties

Sample ID: AA61442

| PARAMETER | SAMPLE RESULT mg/Kg | SAMPLE DUPLICATE RESULT mg/Kg | PRECISION RPD % | QC LIMITS |
|--------------|---------------------------|-------------------------------------|-----------------------|--------------|
| Aroclor-1016 | ND | . ND | ND | 50 |
| Aroclor-1221 | ND | ND | ND | 50 |
| Aroclor-1232 | ND | ND | ND | 50 |
| Aroclor-1242 | ND | ND | ND | 50 |
| Aroclor-1248 | ND | ND | ND | 50 |
| Aroclor-1254 | ND | ND | ND | 50 |
| Aroclor-1260 | ND | ND | ND | 50 |
| Aroclor-1262 | ND | ND | ND | 50 |
| Aroclor-1268 | ND | ND | ND | 50 |